

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Randy Gonzales  
Case No. 23-02837 Chapter 13

All Cases: Moving Creditor U.S. Bank NA, successor trustee to Bank of America, NA, successor in interest to LaSalle Bank NA, on behalf of the registered holders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed Certificates, Series 2006-EC1 Date Case Filed March 2, 2023

Nature of Relief Sought ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing 06/22/2023 or Date Plan Confirmed N/A

Chapter 7: ☐ No-Asset Report filed on \_\_\_\_\_  
☐ No-Asset Report not filed. Date of Creditor's Meeting: \_\_\_\_\_

1. Property

- a. ☒ Home 1924 Great Falls Drive, Plainfield, IL 60586;  
b. ☐ Car Year, Make, and Model \_\_\_\_\_  
c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of June 13, 2023: \$254,074.57  
Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor(s) post-petition:

4. Estimated Value of Collateral (must be supplied in all cases) \$267,000.00, Schedule A/B.

5. Default

- a. ☐ Pre-Petition Default  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_
- b. ☒ Post-Petition Default
- i. ☒ On direct payments to the moving creditor  
Number of months 3 Amount \$4,419.96
- ii. ☐ On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

- a. ☒ Lack of Adequate Protection 11 U.S.C. §362(d)(1)
- i. ☐ No insurance  
ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_  
iii. ☐ Rapidly depreciating asset  
iv. ☐ Other \_\_\_\_\_
- b. ☐ No Equity and Not Necessary for an Effective Reorganization 11 U.S.C. §362(d)(2)
- c. ☐ Other "Cause" 11 U.S.C. §362(d)(1)
- i. ☐ Bad Faith (describe) \_\_\_\_\_  
ii. ☐ Multiple filings

iii. ☐ Other (describe) \_\_\_\_\_

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: 06/21/2023

Respectfully submitted,

/s/Edward H. Cahill

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Attorneys for Creditor

The case attorney for this file is Edward H. Cahill.

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(Rev. 12/21/09)



Prepared by:

Penaser M

**Loan Information:**

Loan Number	Redacted
Debtors Name - 1	RANDY GONZALES
Debtors Name - 2	ESTATE OF CHERYL GONZALES
Property Address	1924 GREAT FALLS DRIVE
Property State	IL

**Bankruptcy Information:**

Bankruptcy Case #	23-02837
Filing Date:	3/2/2023
Person filing:	M1
Number of previous filings:	1

### Post petition due

Post petition due date:	04/01/23	<b>Comment</b> Post-petition taxes and insurance included in annual escrow analysis and added to monthly payments.
Post petition \$\$\$ due:	\$4,419.96	
Post petition insurance:	\$0.00	
Post petition taxes:	\$0.00	
Total Post petition due	<b>\$4,419.96</b>	

### Post-Petition Payment History Detail

[illegible]

Total Due	\$4,419.96		
Total Received		\$0.00	\$4,419.96